

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

| <b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>  | <b>Plaintiffs' Executive Committee for Commercial Claims</b>                        |
|--|---|
| Ronald L. Motley (1944-2013)<br>Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i><br>MOTLEY RICE LLC<br>James P. Kreindler, <i>Co-Chair</i><br>KREINDLER & KREINDLER LLP | Stephen A. Cozen, <i>Co-Chair</i><br>Sean Carter, <i>Co-Chair</i><br>COZEN O'CONNOR |
| Andrew J. Maloney III, <i>Co-Liaison Counsel</i><br>KREINDLER & KREINDLER LLP<br>Robert T. Haeefe, <i>Co-Liaison Counsel</i><br>MOTLEY RICE LLC                                      | J. Scott Tarbutton, <i>Liaison Counsel</i><br>COZEN O'CONNOR                        |

VIA ECF

August 20, 2020

The Honorable Sarah Netburn, U.S. Magistrate Judge  
United States District Court for the S.D.N.Y.  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court at the close of the telephone conference on August 5, 2020, the Plaintiffs' Executive Committees ("PECs"), with the consent of Defendant, the Republic of the Sudan ("Sudan"), write to propose jointly the following schedule for the filing of the pleadings, motion, and briefs authorized by the Court during the August 5, 2020 conference. On August 18, 2020, the PECs and counsel for Sudan met and conferred telephonically and agreed to the following schedule. Sudan's agreement to this schedule is contingent on Plaintiffs promptly proposing and the Court approving a short-form complaint procedure that would allow the Maher, Ryan, and Breitweiser Plaintiffs to be included in the briefing schedule outlined below.

By Tuesday, September 1, 2020, Plaintiffs may file the consolidated and *Ashton* pleadings authorized by the Court at the August 5, 2020 hearing on page 45. *See* Aug. 5, 2020 Tr. at 45:7-18.

By Friday, October 16, 2020, Sudan shall file the motion authorized by the Court. *See id.* at 45:23-46:4.

By Friday, December 4, 2020, all Plaintiffs shall file a single, consolidated opposition brief in response to any motion filed pursuant to the preceding paragraph, as authorized by the Court. *See id.* at 46:4-10.

By Friday, January 22, 2021, Sudan shall file a single, consolidated reply brief in response to Plaintiffs' opposition brief, as authorized by the Court. *See id.* at 46:10-11.

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As stated at the August 5, 2020 telephone conference, Sudan expressly preserves and does not waive any and all objections, privileges, immunities, and defenses that may be available to it, including, without limitation, as to the timeliness of any complaint or claim.

Respectfully submitted,

MOTLEY RICE LLC

By: /s/ Robert T. Haeefe  
ROBERT T. HAEFELE  
MOTLEY RICE LLC  
28 Bridgeside Boulevard  
Mount Pleasant, SC 29465  
Tel.: (843) 216-9184  
Email: rhaefe@motleyrice.com  
For the Plaintiffs' Exec. Committees

COZEN O'CONNOR

By: /s/ Sean P. Carter  
SEAN P. CARTER  
COZEN O'CONNOR  
One Liberty Place  
1650 Market Street, Suite 2800  
Philadelphia, Pennsylvania 19103  
Tel.: (215) 665-2105  
Email: scarter@cozen.com  
For the Plaintiffs' Exec. Committees

KREINDLER & KREINDLER LLP

By: /s/ Andrew J. Maloney  
ANDREW J. MALONEY  
KREINDLER & KREINDLER LLP  
750 Third Avenue  
New York, New York 10017  
Tel.: 212-687-8181  
Email: amaloney@kreindler.com  
For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF  
All Counsel of Record via ECF